



Andrijasevic, R. (2021). Forced Labour in Supply Chains: Rolling Back the Debate on Gender, Migration and Sexual Commerce. *European Journal of Women's Studies*.  
<https://doi.org/10.1177/13505068211020791>

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# Forced labour in supply chains: Rolling back the debate on gender, migration and sexual commerce

European Journal of Women's Studies

1–15

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DOI: 10.1177/13505068211020791

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## Abstract

This article makes a conceptual contribution to the broader literature on unfree labour by challenging the separate treatment of sexual and industrial labour exploitation both by researchers and in law and policy. This article argues that the prevailing focus of the supply chain literature on industrial labour has inadvertently posited sexual labour as the ‘other’ of industrial labour thus obfuscating how the legal blurring of boundaries between industrial and service labour is engendering new modalities of the erosion of workers’ rights that are increasingly resembling those typical of sex work. This article advances the debate on unfree labour both conceptually and empirically. Conceptually, it highlights the relevance of social reproduction in understanding forms of labour unfreedom. Empirically, it demonstrates the similarities in forms of control and exploitation between sex work and industrial work by illustrating how debt and housing operate in both settings.

## Keywords

Human trafficking for sexual exploitation, informalization, social reproduction, supply chain capitalism, unfree labour

## Introduction

Global processes, as Ursula Biemann (2000) has put it, ‘address women directly in their sexuality’ (p. 76). Since the 1990s, transnational feminist, migration and post-colonial scholars have engaged in theoretical and political efforts to challenge views of human trafficking for sexual exploitation as a distinctive form of modern slavery and that of the trafficking victim as dissimilar to other forms of migration due to coercion present in the

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sex sector. They did so by demonstrating that the emergence of human trafficking is deeply intertwined with processes of economic globalization and is to be understood in relation to large-scale women's labour migration (Kempadoo et al., 2015). Conceptualized as a 'counter-geography' of globalization (Sassen, 2000), scholars posited trafficking for the sexual industry, especially in the global South, as deeply intertwined with rural impoverishment and urban unemployment resulting from austerity and adjustments programmes which pressured women to find alternative ways to ensure household survival (Samarasinghe, 2008; Troung, 1990). In addition, they showed that women make use of human trafficking networks to migrate in that their autonomous mobility is impeded by restrictive border and visa policies (Hwang, 2018; Jahnsen and Skilbrei, 2018; Lee, 2010; Pickering and Ham, 2014) and that immigration policies are the key factor in both upholding migrant women's confinement and in restricting their possibilities to access other forms of income besides sex work (Brunovskis and Skilbrei, 2018; Mai, 2018; O'Connell Davidson, 2010; Plambech, 2017; Vuolajärvi, 2018).

By foregrounding migrant women's agency, without overlooking the forms of control and unfreedom that migrant women experienced in the commercial sex industry, scholars showed that the cross-border mobility and the control over labour of women 'trafficked' for sexual exploitation is not exceptional but rather that it resembles other forms of women's transnational labour migration (Andrijasevic, 2010; Cheng, 2010; FitzGerald, 2020; Thorbek and Pattanaik, 2002). The similarity scholars identified in migratory pathways and unfree labour relations between commercial sexual sector and other sectors that require unskilled or low-skilled labour such as manufacturing, domestic and care work, made visible the racialization and feminization of the global work force resulting from economic globalization (Alexander and Mohanty, 1997; Kempadoo and Doezema, 1998). This locating of instances of coercion and exploitation within broader macro-economic and social relations became, in turn, the common ground for conceptual and political projects aimed at extending labour and social protections to all workers and at organizing collective forms of mobilization against labour unfreedom (Cruz, 2018; Kempadoo et al., 2015).

Yet, these projects that aimed at showing commonalities in forms of control and exploitation between sex work and other labour-intensive forms of work, resulted quite paradoxically not in the broadening of the debate but rather in the narrowing of the field of inquiry. Sarkar (2017) puts this succinctly: 'To the extent unfree work in the West today is acknowledged at all, it is assumed to be in the consumptive sphere of sex work' (p. 176). Thus, the association of human trafficking with modern slavery has led to the view that forced labour is atypical or an exception, and hence, is the opposite of free labour (O'Connell Davidson, 2010). This, in turn, has resulted in less severe forms of exploitation being viewed as inherent and, therefore, 'acceptable' within certain economic sectors (Coghlan and Wylie, 2011: 1519).

Given this narrowing of the field, it is perhaps no surprise that the new strand of scholarship that has become the analytical and political hub for debates on unfree labour has distanced itself from sexual labour and developed into an area of inquiry separate from sex trafficking (Gómez-Mera, 2017). The diffusion of global supply chains across the globe and their centrality for production, distribution and consumption has relaunched the debate on how to conceptualize unfree labour (Fudge, 2019; Shamir, 2012). This

strand of scholarship, developed since the early 2010s, investigates industries such as manufacturing, agriculture, fishing, food processing, apparel, and construction in order to assess the link between dynamics that drive the global organization of production and the various forms of labour unfreedom that workers experience in the global economy. The significance of the scholarship on unfree labour in supply chains is that it opened up new scholarly insights into the commercial dynamics that drive unfree labour practices in labour-intensive industries and the ways in which latter are becoming part and parcel of the normal functioning of the global economy.<sup>1</sup>

The argument I put forward in this article is that the prevailing focus of the supply chain literature on industrial labour has inadvertently created the binary opposition between formal (i.e. industrial) and informal (i.e. sexual service) sectors of the economy and posited sexual service labour as the ‘other’ of industrial labour. This, in turn, has obfuscated how the legal blurring of boundaries between industrial and service labour has engendered new modalities of the erosion of workers’ rights that are increasingly resembling those typical of sex work. In challenging the separate treatment of sexual and industrial labour exploitation both by researchers and in law and policy, this article advances the debate on unfree labour both conceptually and empirically. Conceptually, it highlights the relevance of social reproduction in understanding forms of labour unfreedom. I draw here on feminist theorization of how gender and sexuality shape both production arrangements and social relations of reproduction so as to enable labour’s enrolment into regimes of capital accumulation (Baglioni, 2018; Bair, 2010; Mezzadri, 2019; Wright, 2006). The privileging of productive labour as the main analytical site of unfree labour misses the interrelationship between the domains of production and reproduction highlighted by feminist scholars, and obscures the fact that – as I show through the example of ‘posted work’ – the devaluation of work and lack of legal protection that commonly affect ‘women’s work’ are now endemic in labour-intensive industries too.

Empirically, the article demonstrates the similarities in forms of control and exploitation between sex work and industrial work by illustrating how debt – which takes the form of time rather than money – and housing, operate as instances of labour discipline in both settings. I draw on my own findings on migrant workers in the electronics supply chain to illustrate how ‘time debt’ and employer-controlled housing construct relations of dependency and unfreedom. When deployed to examine labour relations in supply chains, the manipulation of working time and the control of workers private space common in trafficking for sexual exploitation, expose the ways in which time debt and employer-provided housing tie workers to the employers in the industrial workplace. The suggestion that I advance here, drawing on feminist legal scholarship, is not just that unfree labour is underpinned by the sexual division of labour but, rather, that unfree labour in supply chains is an outcome of capital’s appropriation and reconfiguration of the reproductive realm (Fudge, 2019; Kotiswaran, 2014; Steward, 2014). Researchers concerned with understanding and eradicating forced labour from supply chains should thus look at the critical literature on trafficking for sexual exploitation to understand both the mechanisms that employers use to confine workers and the ways in which capital mobilizes difference to extract value from labour. After all, sexual commerce is central to the broader national development and workings of transnational capital (Lee, 2010; Sassen, 2000; Scully, 2001).

Binary forms of thinking, including that of 'othering', are theoretically and politically problematic, as they risk perpetuating existing relations of exclusion. Insofar, as sexual service labour is performed by and large by migrant women, the binary opposition between sexual and industrial labour excludes the experiences of migrant sex workers from current theorizations of unfree labour relations. As Clare Hemmings (2011) has eloquently argued, theories are narrative constructs that engender political grammars. In this belief, this article intervenes to change the way scholars tell stories about unfree labour relations in transnational capitalism.

## **Forced labour in supply chains**

Two fields of scholarship, human trafficking for sexual exploitation and that of forced labour in supply chains, rarely intersect. In what follows, I summarize the key areas of intervention and the theoretical premises of the literature on forced labour in supply chain so as to introduce feminist scholars to this novel strand of research.

So far, scholarly debates on forced labour and human trafficking have been dominated by liberal 'neo-slavery' perspective. This approach situates forced labour firmly within the developing world and focuses on individuals' intent to exploit and ill will. More precisely, it conceptualizes forced labour in terms of instances of domination between individuals (i.e. perpetrator versus victim), and it identifies deception at the point of entry and violence as key factors in preventing exit from forced labour conditions (for an example of this line of argument, see Bales, 2000). Scholars studying forced labour in supply chains challenge the liberal 'neo-slavery' perspective by examining the commercial dynamics that underpin unfree labour (LeBaron, 2014; LeBaron and Phillips, 2018; Strauss and McGrath, 2017). They show instead that specific industries, especially those that are labour-intensive, use unfree labour to meet the demand generated by the concentration of production and to achieve financial gain (Feasley, 2016). In other words, firms deploy 'modern slavery as a management practice' (Crane, 2013) with the aim of achieving under-pricing within supply chains.

Scholars of supply chains posit unfree labour as resulting from overlapping constraints, namely the restrictions on freedom of movement, freedom to change employers and freedom to contest working conditions (McGrath, 2013). In transnational production, large brands outsource higher cost and higher risk aspects of production and distribution to suppliers, and in doing so, create intense commercial pressure on price and delivery time along the chain. The low profit margins available to the suppliers, in turn, place downwards pressure on wages and working conditions, and give rise to various forms of exploitative work (Mayer and Phillips, 2017). Firms often prefer migrant workers in that they are temporary, nonunionized and more easily controlled in that they dependent on suppliers to provide them with work and lodgings. To indicate this transnational process through which labour is recruited, put to work and confined, Barrientos (2013) and Gordon (2017) respectively coined the terms 'labor chains' and 'human supply chains'. Restrictions on the freedom to change employers may be explicitly written into workers' contracts, and workers' pay may be withheld if they change employers. Unfreedom is enforced by various strategies of labour discipline and control, such as through debt (LeBaron, 2014) or by binding accommodation to the workplace so that if

workers lose their job, they also lose the right to lodgings. Subordination is exacerbated when migrant workers' authorization to stay in a country is contingent on their work contract, as tying residency to work permits makes migrants vulnerable to deportation. Restrictive immigration policies and lack of adequate labour protections are thus best understood in terms of the strategy to lower labour costs and increase foreign investments (Gordon, 2017; LeBaron, 2014).

In showing that unfree labour is a stable aspect of the contemporary global economy, scholars studying labour in supply chains challenge the idea that forced labour is an 'aberration' (Phillips and Mieres, 2014: 245) from the normal functioning of labour markets and that of unfree labour as the opposite of free waged labour. Strauss and McGrath (2017) speak, therefore, of a 'continuum of exploitation' to suggest not only that coercion can occur at any time such that an initially voluntary undertaking can become coerced, but also to clarify that unfreedom can arise both through physical coercion and through exclusion practised by states through tied visas or precarious legal statuses. This approach, influenced by Marxist political economy, attempts to understand the coexistence of unfree labour with the expansion of capitalism, and challenges the view that unfree labour is a pre-capitalist relation superseded by the development of capitalist labour markets. There is very little discussion of how gendered and sexual organization of labour markets sustain unfree labour relations (for an exception, see Strauss, 2012) and none of the ways in which the development of labour-intensive industries goes hand in hand with the expansion of the sexual service labour.

## **Critical approaches to human trafficking for sexual exploitation**

It is perhaps understandable that scholars of unfree labour in supply chains discount feminist debates on human trafficking, as they do not want to get caught up in vehement discussions over whether sexual labour constitutes economic activity or violence against women. However, in doing so, they disregard the large body of works on human trafficking by migration, post-colonial and transnational feminist scholars who, not dissimilarly to scholars of unfree labour, also critique liberal neo-slavery accounts of forced labour. They do so by showing the interdependencies between economic restructuring and global sex trade as well as between sexual commerce and industrial work. Scully's (2001) work on 19th-century growth of the local commercial sex sectors in South Asia and South America has shown that these developed in response to the recruitment of non-White indentured labour to replace the labour of African slaves in the extractive industries, as well as to the large-scale migration of single, wealth-seeking White European and North American men for colossal construction projects. The sexualized service industry has played a pivotal role, as Jin-Kyung Lee (2010) illustrated, in South Korea's rapid economic rise from being a US neo-colony to an industrial powerhouse. In India, sexual commerce and day-wage labour are far from detached. Svati Shah's (2014) work showed that insofar as migrant women in the construction industry are generally paid at a lower day-wage rate than their male counterparts and are commonly perceived as unskilled labour, the selling of sexual services becomes one of the numerous livelihood strategies in which they engage concurrently.

As for how human trafficking for sexual exploitation come about and is maintained, critical scholars focused their attention on restrictions to migrant women's cross-border mobility, constraints to their ability to determine their own working and living conditions and the ability to access labour markets other than sexual commerce. Scholars have put much work into showing the harmful effects of the United Nations Protocol to Suppress and Punish Trafficking in Persons, Especially Women and Children (the Palermo Protocol), the main international legal instrument to combat human trafficking. The Palermo Protocol, which developed on the back of public outcry against 'sex slavery', has occasioned the pervasive criminalization of migrant sex workers (Grupo Davida, 2015), and has been used as an instrument of social control to remove sex workers from their working environments (Kotiswaran, 2015). Measures to combat human trafficking have resulted in more stringent border and immigration controls to such an extent that border control has become integral to the policing of sex work whereby it is not uncommon for immigration officials to be part of the policing of commercial sex (Jahnsen and Skilbrei, 2018; Vuolajärvi, 2018). Scholars of unfree labour in supply chains have used the term 'labor chains' to describe the dependencies between recruiters and workers; similarly, critical human trafficking scholars have established evidence that anti-immigration measures make migrants reliant on intermediaries to arrange their travel and employment (Andrijasevic, 2010; Plambech, 2017).

Being undocumented restricts migrants' employment choices to such an extent that migrants working in indoor clubs see the sex sector as their only safe option, as it does not involve moving in public spaces and hence, reduces the risk of arrest and deportation (Ribeiro and Sacramento, 2005). Critical scholars have, therefore, established that the legal framework to combat human trafficking has fostered labour market segregation by creating marginalized groups that have no access to the formal labour market, or to any of the protections usually offered by states to citizens and workers (Anderson, 2009; Brennan, 2017). As Mai (2016) conveys well with his term 'bounded exploitation', migrants often endure bonded labour relations for short periods of time in order to have a better life in the longer term. Therefore, critical human trafficking scholars argue, migrant workers cannot be divided into two entirely separate and distinct groups – those who are trafficked involuntarily into the misery of slavery-like conditions in an illegal or unregulated economic sector, and those who voluntarily and legally work in the happy and protected world of the formal economy (Anderson and Andrijasevic, 2008). Like the literature on unfree labour in supply chains, critical trafficking scholars suggest that confinement and exploitation occur within both legal and illegal systems of migration, thus generating a 'continuum of experience' rather than being definable through the free versus forced labour dichotomy (Anderson and O'Connell Davidson, 2003; Shah, 2014). In doing so, critical trafficking scholars have challenged the distinction between 'voluntary' and 'forced' migrant labour, and have made visible how this distinction obscures the similarities among forms of exploitation that take place in low-wage sectors with a high occurrence of migrant workers, of which the sexual service sector is one (Kempadoo et al., 2015).

In sum, critical scholars have challenged the way in which sexual labour and other forms of low-waged work are discursively produced as distinct from one another and the notion that border and immigration controls are gender and sexuality-neutral. Instead,



they have showed the interdependency between sexual labour, industrial labour and broader economic development and revealed that normative assumptions about femininity and women's sexuality are inscribed within immigration and labour regulations.

## **Interdependencies or moving forward the debate on labour unfreedom**

In what follows I revisit the debates on debt, housing and service work in order to show how insights from critical human trafficking might be helpful to better understand forms of confinement and labour control that foster unfree labour in industrial work and to draw attention on how the emerging erosions of worker rights are an outcome of the blurring of the boundary between the industrial and service economies.

### *From monetary debt to time debt*

Scholars of unfree labour in supply chains have identified monetary debt as a cornerstone of unfree labour relations; migrant workers contract debt due to high recruitment fees or credit to cover travel, visa and accommodation costs. Consequently, debt restricts workers' freedom on all three fronts: to move, change employers and contest working conditions (LeBaron and Phillips, 2018; Strauss and McGrath, 2017). Debt, as LeBaron (2014: 766) has put it, is a mechanism of 'labour discipline' that precludes exit from a contract, regardless of working conditions, and bonds workers to a particular employer or intermediary (Phillips and Mieres, 2014).

While concurring on how monetary debt operates in relation to labour confinement, critical trafficking scholars have shown that debt per se does not preclude exit from unfree labour relations. Research into the agency that migrant sex workers exercise has debunked the assumption that women exit unfree labour relations because they have been 'rescued' by the police. On the contrary, the largest percentage of migrant women who experience unfree labour escape those exploitative situations unaided (Della Giusta et al., 2008). Given the fact that monetary debt in itself does not impede exit from conditions of confinement, critical trafficking scholars suggest that 'holding' workers for a certain period of time in order to exploit their sexual labour, appropriate their earnings and maximize economic gain is more profitable than the repayment of debt per se (Andrijasevic, 2010). Consequently, as clients pay for sex workers' time, the manipulation of working time is identified as the key control modality in the creation of dependency and unfreedom (Cruz et al., 2017; Sanders and Hardy, 2014).

Recent studies into control strategies in garment and electronics supply chains have foregrounded the relevance of what I call 'time debt' for extracting maximum value from labour and bounding workers to the employers. Jenkins and Blyton's (2017) research on Indian garment factories and Andrijasevic and Sacchetto's (2017) study of electronics assembly in the Czech Republic illustrate how employers use time as the workplace currency and deliberately construct debt relations. When workers do not put in the hours because of deficiencies in supply chain management or low volume of orders, they still receive their wage, but they now 'owe' the hours paid but not yet worked to the employer.



Over time, the workers' time debt becomes so large that, in addition to working their normal hours, they are unable to work back the hours they owe to the employer. Time debt serves thus as a mechanism of control over labour in that it ties workers to the employer, especially during periods of low production.

Similarly to how control operates in the sexual service economy, in manufacturing the debt relationship pivots on the manipulation of working time, not with the aim to keep the workforce indefinitely, but rather to establish a temporal bond that enables firms to meet fluctuating market demand. Importantly, time debt is also, I suggest, a lens through which we can observe global capital's refashioning of the old spatial separation between productive versus reproductive labour into the novel temporal distinction paid labour versus potential labour. This temporal distinction enables employers to colonize and commodify (i.e. advance) labour potentials, or rather, workers' availability to work in the near future by only compensating the time in the present production. The conceptual contribution that the time perspective makes to the literature on unfree labour in supply chains is, therefore, in revealing how employers offload the risks of fluctuating market demand onto workers and construct debt relations that deepen workers dependency and impede exit.

### *Integration of production and reproduction spheres*

Scholars of unfree labour in supply chains, like scholars of human trafficking, study employer-provided housing (EPH) as a form of control over migrant labour. The former have noted that EPH is a form of tied accommodation that creates relations of dependency between workers and employers, confining workers' freedom of movement and restricting their social interactions (McGrath, 2013; Strauss and McGrath, 2017). Research into EPH in human trafficking draws very similar conclusions: being in charge of accommodation arrangements gives third parties more control over women's time and labour, in particular, when they are undocumented and deepens occupational gender segregation in that it restricts migrants' employment choices (Mai, 2018; Ribeiro and Sacramento, 2005). The fact that sex work often takes place in the 'private' sphere is important not only because it leads to high levels of exploitation, control and abuse, but also because it conceptually shows how sex work, as a form of 'commodification or monetization of socially reproductive labour' (Cruz, 2018: 76), troubles the separation between productive and reproductive spheres.

The integration of productive and reproductive spaces is at the very core of the flexible labour regime deployed in global supply chains. Dormitory labour regime (Pun, 2016) through which this integration is achieved, merges the productive and reproductive spheres in order to enable management to extend control over labour from the factory floor to workers' sleeping and living quarters, thus extracting additional value from workers' 'private' lives. Located in proximity to factories, dormitories combine spaces of work and residence, thus permitting transnational corporations to lengthen the workday and command almost all daily reproduction of labour. Studies of electronics supply chains (Andrijasevic and Sacchetto, 2017; Schling, 2017) convey this best when describing how managers turn up at workers rooms and make workers return to work even though these might have just finished their shift and have retired to the dormitory to get

some sleep. Being always within management's reach limits workers' freedom to control their working and living conditions as it imposes random shifts and overtime and deprives workers of recovery time. As accommodation is tied to the work contract, for migrant workers losing work equals losing accommodation and hence, immediate homelessness.

The insights provided by critical trafficking scholars on how unfreedom in sexual commerce is maintained through simultaneous control of working and living quarters are conceptually highly relevant for today's labour-intensive industries as they allow us to see how capital's control of relations of production pivots on its *direct* control over social reproduction of labour. In contrast to the law that draws the line between productive and reproductive work, capital has blurred the boundary between work and off-work time and space thus appending the traditional sexual division of labour and making manifest that for their very functioning, global supply chains are contingent on the appropriation of workers reproductive realm. How such appropriation is 'depleting' (Plomien and Schwartz, 2020) the conditions for social reproduction of migrant labour is best illustrated by the fact that dormitories host single workers rather than families and implement a strict no children policy, hence, placing migrant workers outside the regular cycles of the reproductive sphere and orienting all activity towards meeting the production needs of the firm.

### *Workers as a service*

Discussion of industrial labour and service labour are rarely compared for their similarities. Yet, there is a form of work widespread in Europe, so-called 'posted work', that makes visible the blurring of boundaries between the industrial and service economies. Under European Union (EU) law, posted work refers to a worker sent by their employer to work temporarily in another EU member state and is most prevalent in construction, shipbuilding, hospitality, meatpacking and manufacturing. Consequently, workers are only temporarily 'posted' from one state to another, with the intention that they will briefly perform certain services (for the agreed service provider) in the host state and then return to their home state. While they are referred to as workers in the wording of the legislation, posted workers are not, under law, exercising their right to freedom of movement as workers, the legal right that entitles EU citizens to look for a job in another EU country, stay there even after their employment has finished, and enjoy equal treatment with nationals in access to employment, working conditions, and all other social and tax advantages. Instead, their mobility is better described as free service mobility and is regulated under the Posting of Workers Directive (PWD), the objective of which is to remove legal and administrative barriers to temporary movement of services by employers within the EU. In other words, to facilitate the transborder mobility of workers through specifically identifying human beings (workers) as 'services'.

What interests me here is that because posting is considered a movement of services rather than workers, posted workers are notionally regarded as not gaining access to the labour market of the state to which they move. In other words, being identified as services places posted workers outside of the host country's institutional employment framework and trade union representation (Novitz, 2014). The situation is even more

difficult for non-EU citizens who might be treated as 'illegal' in the host country, even though they have been posted legally. We can see this best in the case of Serbian workers posted to Slovakia for electronics assembly. In 2017, Slovak Labour Inspectorate alerted police to 'illegal' work taking place at an assembly plant which both implied that workers had overstayed the 90 days visa-free period and that they had no employment contract with the assembler. Workers, however, had a contract with a temporary work agency that recruited them in Serbia, signed on as posted workers with the Hungarian branch of the same agency (thus, formally posted from another EU member state), and then leased them to the assembler in Slovakia as the final employer. While workers experienced conditions associated with unfree labour that I will illustrate below, their status of posted workers excluded them from Slovak institutional labour framework and its channels of representation. Instead, they got arrested, detained and deported (Andrijasevic and Novitz, 2020).

I suggest that posted workers' 'outside' position presents striking similarities with work performed by migrant workers in sexual service economy. Posted workers, like migrant sex workers or domestic or care workers, are located outside of the host country's 'formal' labour market thus significantly limiting such workers' ability to claim or enforce their employment and social rights. These limits to regulatory protection and collective representation result in substantial labour violations for posted workers, such as lack of employment security, payment below the host country's minimum wage, above-maximum working times, bogus deductions for social insurance and non-payment of holiday pay and overtime (Alberti and Danaj, 2017; Wagner, 2018).

In the above case of Serbian workers, this meant that they earned less than they were originally promised, not because they were not paid the contracted hourly rate (€2.20 per hour which is less than the national minimum wage of €3.58), but because the agency deducted costs of accommodation and transport from their wage and did not pay them the promised bonus for regular attendance. Workers worked shifts of 12 hours with a 30-minute unpaid break, permitted only if the line managers allowed it, and had to take on overtime work as otherwise they could face dismissal. In case they left during the notice period, workers had to pay damages to the employer totalling their entire pay. No worker was paid in accordance with deductions for social security or was provided with health coverage and since salaries were paid in cash, it was impossible for workers to challenge any deductions or non-payment. In addition, workers experienced social isolation and control over their movements, as they were housed in dormitories off city centre and shuttled to work by the contractors (Andrijasevic and Novitz, 2020). In sum, this is a workforce trapped within a labour engagement that they have entered voluntarily but found difficult to exit, tied into a contract with a particular employer, under the threat of a financial penalty and/or non-payment of wages, subject to illicit deductions from pay, vulnerable to deportation, risking homelessness because of tied accommodation, isolated by geography and language, and distant from any meaningful legal protections.

Importantly, short-term posted work is on the rise in Europe and had already become more prevalent than the classic long-term free movement of workers (Mussche and Lens, 2018). The legal classification of large segments of the industrial workforce as 'services' shows the arbitrariness of the neat distinction between the industrial and service economies. The case of posted workers thus points to a continuum in terms of labour rights violations and labour exploitation between posted work and 'traditional' service work. In

other words, placing of large segments of ‘industrial’ work within the regulatory domain of the service economy has limited workers’ social and legal protections, while simultaneously rendering them extremely vulnerable, including to unfree labour. As Katie Cruz (2018) has put it succinctly, the working conditions and labour rights of industrial or manufacturing workers ‘are diminishing and increasingly resembling those characteristic of sex work’ (p. 82).

## Conclusion

The argument I put forward in this article is that current theorizing on unfree labour in supply chains has established a binary mode of thinking about labour markets as divided between productive industrial labour and sexual service labour. This dualism privileges labour-intensive industries and the production sphere as sites in which to examine the dynamics that give rise to unfree labour. The omission of critical human trafficking scholars’ insights from the literature on unfree labour in supply chains is alarming in that it perpetuates what Saskia Sassen (1998) has called a ‘narrative of eviction’. Such narrative construes economic dynamics as gender- and sexuality-neutral and limits the analytical prism through which to investigate changing regimes of control and exploitation.

This article draws out the elements of commonality between industrial and sexual service labour so as to expose a continuum between sectors that are usually kept apart in scholarly analyses of unfree labour. In doing so, it makes visible the ways in which the reconfiguration of the traditional sexual division of labour underpins the formation of unfree labour under current wave of capitalist development. It also shows how the legal blurring of boundaries between industrial and service labour is engendering new modalities of the erosion of industrial workers’ rights that are increasingly resembling those typical of sex work.

The theoretical implications of identifying elements of commonality between industrial and sexual service labour are in making visible, as Anna Tsing (2009) has demonstrated, how ‘supply chain capitalism’ mobilizes difference – gender, sexuality, citizenship status – to structure global production processes and extract value from labour. The political implications of bringing critical accounts of global sex trade to bare on forced labour in supply chains are in grounding the struggles against forced labour in the experiences and subjectivities of migrant women and sex workers, especially from the global south, whose voices have laid the foundations for the redefinition of the ‘neo-slavery’ narratives of human trafficking (Kempadoo, 2015).

## Acknowledgements

Judy Fudge, Nicola Mai, Maria Fannin and May-Len Skilbrei – thank you for your comments and suggestions on an earlier version of this article. I would also like to thank the anonymous peer reviewer, whose words I have borrowed to make my argument and contribution to the literature clearer, sharper and overall more focused.


## Declaration of Conflicting Interests

The author(s) declared no potential conflicts of interest with respect to the research, authorship and/or publication of this article.

## Funding

The author(s) received no financial support for the research, authorship and/or publication of this article.

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## Note

1. This conceptual opening has gone hand in hand with a policy change and the adoption of Protocol 2014 to the Forced Labour Convention of 1930 (i.e. the International Labour Organization Forced Labour Protocol).

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